

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

MARK STANALAJCZO, DDS,

Plaintiff,

Case No. 23-cv-11527

Hon. Matthew F. Leitman

v.

BRANDONN PERRY, et al.,

Defendants.

**STIPULATION TO EXTEND DISCOVERY
AND CASE MANAGEMENT ORDER DATES**

NOW COMES Plaintiff and Defendants, through counsel, who stipulate to the following:

The parties, having discussed this matter on December 28, 2023, and January 23, 2024, stipulate that the dates set forth in this Court's Case Management Order, ECF No. 15, PageID.187-196, should be extended by three months. The parties require three months of additional discovery, given that (1) there have been delays in the responses to discovery requests that have slowed the progression of this case; (2) an amended pleading that added new parties was filed on January, 18, 2024, with an answer due on or before February 8, 2024; and (3) scheduling issues required the parties to plan the first round of depositions to take place during the second week of February, 2024. The parties agree that the Case

Management Order shall remain in full effect, with the proviso that dates shall be extended accordingly. The parties agree upon the following new dates:

Fact Discovery Cutoff:	May 24, 2024
Rule 26(a)(2) Proponent Expert Disclosures:	June 21, 2024
Rule 26(a)(2) Rebuttal Expert Disclosures:	July 19, 2024
Expert Discovery Cutoff:	August 23, 2024
Dispositive Motions and Challenges to Experts:	Sept. 24, 2024
Rule 26(a)(3) Pretrial Disclosures:	Dec. 13, 2024
Motions in Limine:	January 3, 2025
Response briefs due 10 days after filing, but not later than January 15, 2025. Reply briefs due 5 days after responses are filed, but not later than January 21, 2025.	
Final Pretrial Order:	January 22, 2025
Final Pretrial Conference:	February 5, 2025 at 1:30 p.m.
Trial Date:	February 18, 2025 at 9:00 a.m.
Estimated Length of Trial:	4-5 days

It is so stipulated.

/s/Dennis Dubuc
Dennis B. Dubuc (P67316)
Attorney for Plaintiff
ESSEX PARK LAW OFFICE, P.C.
12618 10 Mile Road
South Lyon, MI 48178
(248) 486-5508
lawplus@sbcglobal.net

/s/Timothy H. Howlett (w/perm.)
Timothy H. Howlett (P24030)
Attorney for Defendants
DICKINSON WRIGHT PLLC
Attorneys for Defendants
500 Woodward Avenue, Suite 4000
Detroit, MI 48226
(313) 223-3500
thowlett@dickinsonwright.com
adelmastro@dickinsonwright.com

/s/Frank J. Lawrence

Frank J. Lawrence (DC #1048420)

Co-Counsel for Plaintiff

LAW OFFICE OF FRANK LAWRENCE

941 Westview Road

Bloomfield Hills, MI 48304

(248) 722-2560

flawrence1@hotmail.com

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

MARK STANALAJCZO, DDS,

Plaintiff,

Case No. 23-cv-11527

Hon. Matthew F. Leitman

v.

BRANDONN PERRY, et al.,

Defendants.

**ORDER EXTENDING DISCOVERY
AND CASE MANAGEMENT ORDER DATES**

Consistent with the stipulation of the parties,

IT IS HEREBY ORDERED that the dates set forth in this Court's Case Management Order, ECF No. 15, PageID.187-196 shall be extended by three months. In all other respects, the directives of the Case Manager Order shall remain in effect. Accordingly, the Case Management Order is now amended with the following dates:

Fact Discovery Cutoff:	May 24, 2024
Rule 26(a)(2) Proponent Expert Disclosures:	June 21, 2024
Rule 26(a)(2) Rebuttal Expert Disclosures:	July 19, 2024
Expert Discovery Cutoff:	August 23, 2024
Dispositive Motions and Challenges to Experts:	Sept. 24, 2024
Rule 26(a)(3) Pretrial Disclosures:	Dec. 13, 2024
Motions in Limine:	January 3, 2025

Response briefs due 10 days after filing, but not later than January 15, 2025. Reply briefs

due 5 days after responses are filed, but not
later than January 21, 2025.

Final Pretrial Order:

January 22, 2025

Final Pretrial Conference:

February 5, 2025
at 1:30 p.m.

Trial Date:

January 18, 2025
at 9:00 a.m.

Estimated Length of Trial:

4-5 days

s/Matthew F. Leitman

MATTHEW F. LEITMAN

UNITED STATES DISTRICT JUDGE

Dated: January 25, 2024